

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SEP 06 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

WANDA SUE SKILTON

Defendant

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§
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§
§

CRIMINAL NO.

Count 1: 42 U.S.C. § 408(a)(5)

Counts 2-3: 18 U.S.C. § 1001

18CR 538

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conversion of Benefits by Representative Payee – 42 U.S.C. § 408(a)(5)

From in or around September 2014, and continuously through in and around October 2017,
within the Southern District of Texas,

WANDA SUE SKILTON

defendant herein, having made application to receive any benefit under Title 42, Chapter 7,
Subchapter II of the United States Code for the use and benefit of another and having received
such benefit, knowingly and willfully converted such benefit and any part thereof, totaling
approximately \$25,246, to a use other than for the use and benefit of such other person.

In violation of Title 42, United States Code, Section 408(a)(5).

COUNT TWO

False Statement – 18 U.S.C. § 1001

On or about June 5, 2017, within the Southern District of Texas,

WANDA SUE SKILTON

defendant herein, in a matter within the jurisdiction of the executive branch of the Government of
the United States, did knowingly and willfully make a material false, fictitious, and fraudulent
statement and representation, to wit: that J.S. lived with her half of the time from February 1, 2015

to January 31, 2016 and that the \$7,980 she received as the Representative Payee for J.S. was spent on J.S.'s care and support. The statement and representation was false because, as **WANDA SUE SKILTON** then and there knew, J.S. did not live with her from February 1, 2015 to January 31, 2016 and she did not spend the \$7,980 she received as the Representative Payee for J.S. on J.S.'s care and support.

In violation of Title 18, United States Code, Section 1001.

COUNT THREE
False Statement – 18 U.S.C. § 1001

On or about June 5, 2017, within the Southern District of Texas,

WANDA SUE SKILTON

defendant herein, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a material false, fictitious, and fraudulent statement and representation, to wit: that J.S. lived with her half the time from February 1, 2016 to January 31, 2017 and that the \$7,982 she received as the Representative Payee for J.S. was spent on J.S.'s care and support. The statement and representation was false because, as **WANDA SUE SKILTON** then and there knew, J.S. did not live with her from February 1, 2016 to January 31, 2017 and she did not spend the \$7,982 she received as the Representative Payee for J.S. on J.S.'s care and support.

In violation of Title 18, United States Code, Section 1001.

A True Bill:

Original Signature on File

Grand Jury Foreperson

RYAN K. PATRICK
United States Attorney

By:

A handwritten signature in black ink, appearing to read "B. C. Sandel", written over a horizontal line.

Benjamin C. Sandel
Special Assistant United States Attorney
713-567-9726